

1 of 5

UNITED STATES DISTRICT COURT

FILED 20 APR '17 13:49 USDC-ORP

DISTRICT OF OREGON

ANDREA OLSON, an individual, Plaintiff

Case No. 3:15-cv-02216-HZ

-VS-

MBO PARTNERS, INC., A Virginia Corporation; **UNITED STATES OF AMERICA**, by and Through the Department of Justice, Department of Energy, and Bonneville Power Administration; and **JAMES COX**, United States Attorney's Office

MOTION FOR EXTENSION OF TIME TO ANSWER

Plaintiff, Andrea Olson, respectfully requests an order granting plaintiff, an additional 14 days in which to move, plead or otherwise respond to **Defendant MBO's Motion to Dismiss Plaintiff's Amended Complaint, or in the Alternative, to Stay and Compel Arbitration and Memorandum in Support**. I have been unable to find an attorney who can assist me and I have been denied legal counsel as a reasonable accommodation and as an indigent party.

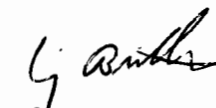
In addition, Plaintiff has been in contact with opposing counsel to discuss the possibility of resolution to Case No. 3:15-cv-02216-HZ.

Respectfully Submitted,



4/20/2017

Andrea Olson, Plaintiff
3404 SW Comus St
Portland, OR 97219
Andrea.olson8888@gmail.com


Craig Butler
Power of attorney
for Andrea Olson



Andrea Olson <andrea.olson8888@gmail.com>

2 of 5

Olson v. MBO Partners/BPA

Mooney, Jenna <jennamooney@dwt.com>
To: Andrea Olson <andrea.olson8888@gmail.com>
Cc: "Folkestad, Vicki" <vickifolkestad@dwt.com>

Wed, Apr 19, 2017 at 9:45 AM

Hi Andrea,

I'm happy to talk. Unfortunately, I am in meetings until about 2:00. Can you make a call at or after 2:00 work? Will you have your power of attorney available on the phone as well?

I have not been in touch with Jim Cox, but I will find his contact information and inquire about his availability this afternoon.

Best,

Jenna

From: Andrea Olson [mailto:andrea.olson8888@gmail.com]
Sent: Tuesday, April 18, 2017 6:30 PM
To: Mooney, Jenna
Subject: Olson v. MBO Partners/BPA

Hi Jenna-

As I mentioned in the voicemail, Eric Rumbaugh suggested I get in touch with you regarding settlement. He also indicated you would know how to reach Jim Cox, who is apparently representing BPA.

I would like to discuss settlement over the phone. May I call you and Jim Cox at noon tomorrow? If the proposed time is inconvenient, please let me know an alternative time that works better for both of you. I will also need Jim's contact phone number.

Thank you for your consideration.

Andrea
503 452 8888



Andrea Olson <andrea.olson8888@gmail.com>

3 of 5

Olson v. MBO Partners/BPA

Andrea Olson <andrea.olson8888@gmail.com>

Wed, Apr 19, 2017 at 11:49 AM

To: "Mooney, Jenna" <jennamooney@dwt.com>

Cc: daodenorr@bpa.gov

Hi Jenna-

Thank you for your message. I am cc'ing Donna Oden-Orr in this message so that she may help facilitate a connection to Jim or other representative from BPA.

Without BPA in the conversation, it seems it would be difficult to come up with the proper resolution. Does that seem logical?

Hope Donna can help us find a BPA representative to join us in the conversation today. I appreciate your help in gathering all parties together as Eric mentioned you would be able to assist with that during my phone conversation with him yesterday.

Thanks again.

Andrea

[Quoted text hidden]

4 of 5

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

ANDREA OLSON, an individual, Plaintiff

Case No. 3:15-cv-02216-HZ

-VS-

MBO PARTNERS, INC., A Virginia
Corporation; **UNITED STATES OF AMERICA**, by and
Through the Department of Justice, Department of Energy, and Bonneville Power
Administration; and **JAMES COX**, United States Attorney's Office

MOTION FOR EXTENSION OF TIME TO ANSWER

ENTRY

The foregoing request is APPROVED/DENIED. Plaintiff's time to move, plead or otherwise respond to **Defendant MBO's Motion to Dismiss Plaintiff's Amended Complaint, or in the Alternative, to Stay and Compel Arbitration and Memorandum in Support** is extended to the _____ day of _____, 2017.

It is so ORDERED.

Honorable Marco A. Hernandez

Respectfully Submitted,




Andrea Olson, Plaintiff

3404 SW Comus St

Portland, OR 97219

Andrea.olson8888@gmail.com


Craig Butler
POA for Andrea Olson

4/20/2017

5 of 5

CERTIFICATE OF SERVICE

On April 20, 2017, I, Andrea Olson, Plaintiff, am serving a Motion for Extension of Time to Answer with this Court to the following parties:

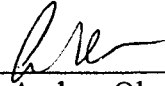
Hand-delivered to 7th floor:

Honorable Marco A. Hernandez
Mark O. Hatfield United States Courthouse
Room 1427
1000 Southwest Third Avenue
Portland, OR 97204-2944

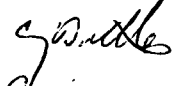
Electronic Mail and U.S. Mail:

Jenna L. Mooney, Esq.
jennamooney@dwt.com
Kalia Walker, Esq.
kaliawalker@dwt.com
Davis Wright Tremaine, LLP
1300 SW Fifth Avenue, Suite 2400
Portland, OR 97201-5610

James E. Cox, Jr., Esq.
Jim.cox@usdoj.gov
United States Attorney's Office
Assistant United States Attorney
1000 SW Third Ave., Suite 600
Portland, OR 97204

 4/20/2017

Andrea Olson


Craig Butler
POA for Andrea Olson